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Co-Counsel to the WHC Liquidation Trust

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JEREMY ROSENTHAL, AS LIQUIDATION
TRUSTEE OF THE WHC LIQUIDATION
TRUST,

Plaintiff,

v.

HALSEN HOLDINGS, LLC, a California
limited liability company; SOUTH TEXAS
ASSOCIATES & RESOURCES, a California
corporation; PENINSULA HEALTHCARE
MANAGEMENT LLC, a Nevada limited
liability company; DANIEL BROTHMAN, an
individual; EDITH BROTHMAN, an
individual; STACY SEAN FOWLER, an
individual; EDMUND C. KING, an
individual; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 5:23-cv-06216-EKL

**STIPULATION FOR DISMISSAL &
[PROPOSED] ORDER**

Courtroom: 7

Judge: Eumi K. Lee

Complaint Filed: December 1, 2023

Trial Date: None

1 Plaintiff Jeremy Rosenthal, in his capacity as the Liquidation Trustee of the WHC
 2 Liquidation Trust and representative of the bankruptcy estates of Watsonville Hospital Corporation
 3 and certain of its affiliates and Defendants Halsen Holdings, LLC, South Texas Associates &
 4 Resources, Peninsula Healthcare Management LLC, Daniel Brothman, Edith Brothman, Stacy Sean
 5 Fowler, and Edmund C. King hereby jointly stipulate under FRCP 41(a)(1)(A)(ii) that this action be
 6 dismissed with prejudice as to all claims, causes of action, and parties, with each party bearing that
 7 party's own attorneys' fees and costs.

8 **IT IS SO STIPULATED.**

9 Dated: November 12, 2024

PERKINS COIE LLP

11 By: /s/ Paul S. Jasper

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*Counsel to Plaintiff
 Jeremy Rosenthal, as Liquidation
 Trustee of the WHC Liquidation Trust*

17 Dated: November 12, 2024

KAUFMAN DOLOWICH, LLP

18 By: /s/ Tad A. Devlin

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 Associates & Resources, Peninsula
 Healthcare Management, LLC, Daniel
 Brothman, Edith Brothman, Stacy Sean
 Fowler, and Edmund C. King*

Attestation Pursuant to Civil Local Rule 5-1(i)(3)

I, Paul S. Jasper, attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: November 12, 2024

/s/ Paul S. Jasper

Paul S. Jasper, Bar No. 200138

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

Hon. Eumi K. Lee

United States District Judge